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7 **DISTRICT COURT**
8 **CLARK COUNTY, NEVADA**

9 UNITED STATES OF AMERICA,)
10)

11 Plaintiff,)

12 vs.)

13 ASHLEE M. MARTIN, an individual,)

14 Defendant.)
15)

Case No.: 2:12-cr-00400-JAD-GWF

DEFENDANT'S UNOPPOSED
MOTION TO MODIFY
CONDITIONS OF RELEASE

16
17 COMES NOW Defendant ASHLEE M. MARTIN by and through her attorney of record,
18 CRAIG W. DRUMMOND, ESQ., and hereby moves this Honorable Court to modify the
19 Defendant's Conditions of Release to allow her to travel to New Castle, Utah, to remove
20 monitoring device and reduce sobriety requirement to non-excessive.

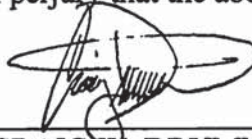
21 This motion is made and based on the enclosed affidavit of counsel, Points and
22 Authorities, all pleadings and papers on file herein and any oral argument requested by the Court
23 at the time of hearing.

24 **I.**
STATEMENT OF FACTS

25 On April 9, 2013 this Honorable Court first granted to modify the conditions of release
26 whereby the third party custodian requirement was removed and Defendant was able to reside in
27 Las Vegas in order to gain and maintain employment. Since then, the Defendant has maintained
28 stable employment and has fully complied with all other conditions of release, including staying

11

4. I sign and declare under penalty of perjury that the above statement is true and correct.

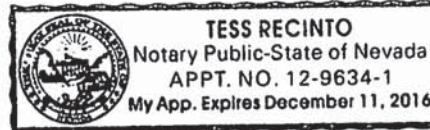


CRAIG W. DRUMMOND, ESQ.
Nevada Bar No. 11109

SUBSCRIBED AND SWORN TO ME
on this 28 day of October, 2013.



NOTARY PUBLIC



**III.
CONCLUSION**

WHEREFORE, the Defendant requests this Honorable Court to modify the Defendant's Conditions of Release to allow her to travel to New Castle, Utah, remove the monitoring device, and reduce sobriety requirement to non-excessive. All other conditions of pre-trial release to remain the same.

DATED this 28 of October, 2013.

Respectfully Submitted,



By

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE
DATED: November 6, 2013

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28 day of October, 2013, the undersigned served the foregoing Defendant's Motion on all counsel herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.



An Employee of DRUMMOND & NELSON LAW FIRM

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Exhibit A

October 10, 2013

To whom it may concern,

My name is Susan Vincuilla mother of Ashlee Martin. My parents are Darwin and Revoe Hulet of New Castle Utah. My father is 85 years old and has health problems. He had a knee replacement surgery recently and had a mechanical heart valve put in several years back which has now failed. My father has been calling all us kids asking us to get his grandchildren and great grandchildren to come to New Castle to see him as much as possible in light of his deteriorating health. You see my daughter is a defendant who was released last December on pretrial ankle monitoring. Her pretrial officer Jamie Sroup has now voiced that he will recommend removing the monitoring device to allow more freedom. I write to ask that she be allowed to travel to Utah providing that she schedule her time here with Jamie Sroup. She has told me that she is more than willing to even call Jamie from her home phone when she leaves Las Vegas and call him from my home phone when she arrives here in New Castle and Vice Versa. My daughter has a six year old little boy Taesom and these visits would also be for him. Our family is a dose loving family and we would like to keep it as so. Ashlee has a cousin and uncle here in New Castle who are members of the police force her cousin being Deputy Sherriff and uncle being Sergeant with the Iron County Sheriff's Office who are aware of Ashlee's situation. Ashlee and I have no problem checking in with Jamie at any time during her visit. New Castle is a small rural community located just 55 miles NW of Saint George Utah and 32 miles W of Cedar City Utah with a population of about 400.


Susan Vincuilla

New Castle Utah


Darwin Hulet

New Castle Utah